April Barker

From:

April Barker

Sent:

Tuesday, June 15, 2021 11:59 AM

To:

Walker, Leita

Cc:

Kelley, Matthew E.

Subject:

RE: Initial Disclosures

Leita,

To expedite the process of exchange of documents – as the judge noted, discovery has been long stalled – please forward your proposed protective order as soon as possible.

Thank you, April



April Rockstead Barker | Attorney

SCHOTT, BUBLITZ & ENGEL s. c.

ATTORNEYS AT LAW 640 W. Moreland Boulevard Waukesha, WI 53188

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From: Walker, Leita < WalkerL@ballardspahr.com>

Sent: Tuesday, June 15, 2021 11:31 AM **To:** April Barker abarker@sbe-law.com

Cc: Kelley, Matthew E. <KelleyM@ballardspahr.com>

Subject: RE: Initial Disclosures

Hi, April, we'll produce non-privileged documents in response to properly served requests for production and after entry of a suitable protective order. We're not required to produce documents with initial disclosures.

When the time comes for production, I believe we provide them to you on disc, but I will double check on that.

Leita

From: April Barker abarker@sbe-law.com>
Sent: Tuesday, June 15, 2021 10:34 AM

To: Walker, Leita (Minn) < <u>WalkerL@ballardspahr.com</u>>

Subject: Initial Disclosures

EXTERNAL

Hi Leita,

I hope that you are well.

I am following up on the email message that forwarded Netflix's initial disclosures. The disclosures reference certain non-privileged documents and materials as available for inspection.

What would be the simplest way of arranging for duplication of these materials so that I don't have to travel to view them?

Thank you, April



April Rockstead Barker | Attorney

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